

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

H.B.,) CIVIL ACTION FILE
)
Plaintiffs,) NO. 1:22-CV-01181-JPB
)
v.)
)
RED ROOF INNS, INC., et al.,)
)
Defendants.)

DEFENDANTS' EXPERT DISCLOSURE

Pursuant to Rule 26(a)(2)(A) of the Federal Rules of Civil Procedure, Defendants Red Roof Inns, Inc., FMW RRI I, LLC, and RRI West Management, LLC submit the following names of the expert witnesses they anticipate calling to testify at trial to provide expert testimony in their respective fields.

RETAINED EXPERTS

1. *Greg Bristol*
Criminality & Law Enforcement Expert
BREAK THE CHAIN LLC
15920 Fairway Drive
Dumfries, Virginia 22025
(304) 492-5855
2. *Kimberly Mehlman-Orozco, Ph.D.*
Human Trafficking Expert
BREAK THE CHAIN LLC
15920 Fairway Drive
Dumfries, Virginia 22025
(703) 362-9405

3. *Matthew Norman, M.D.*
Board-certified Psychiatrist
4401 Northside Pkwy NW, Suite 245
Atlanta, Georgia 30327
(404) 495-5900
4. *Michael Seid*
Franchise Expert
MSA WORLDWIDE
94 Mohegan Drive
West Hartford, Connecticut 06117
(869) 523-4257

The reports of the above-mentioned experts, pursuant to Rule 26(a)(2)(B) of the Federal Rules of Civil Procedure, are being served on Plaintiff in accordance with this Court's Amended Scheduling Order.

This 26th day of July, 2023.

Respectfully submitted,

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FMW RRI I, LLC, and RRI West
Management, LLC*

RULE 7.1D CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(D) of the United States District Court of the Northern District of Georgia, the undersigned certifies that the foregoing submission to the Court was computer-processed, double-spaced between lines, and used Times New Roman font of 14-point size.

Dated: July 26, 2023

/s/ Sandra J. Wunderlich

Sandra J. Wunderlich

*One of the Attorneys for Defendants Red
Roof Inns, Inc., FMW RRI I, LLC, and
RRI West Management, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2023, ***Defendants' Expert Disclosure*** was filed electronically. Service of this filing will be made pursuant to Civ. R. 5(b)(2)(e) by operation of this Court's electronic filing system. Parties may access the filing through the Court's system.

/s/ Sandra J. Wunderlich

Sandra J. Wunderlich

*One of the Attorneys for Defendants Red
Roof Inns, Inc., FMW RRI I, LLC, and
RRI West Management, LLC*